



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

5HW-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

EPA Region 5 Records Ctr.



354216

Mr. James J. Cowhey, President
Land and Lakes Company
123 N. Northwest Highway
Park Ridge, Illinois 60068

Re: Your Request for Termination of
Interim Status, Land and Lakes Company
2000 East 122nd Street
Chicago, Illinois 60633
EPA ID No. ILD 000 672 790

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MAY 09 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Dear Mr. Cowhey:

As you are aware, Land and Lakes Company, by letters dated August 11 and September 19, 1983, requested that EPA terminate the hazardous waste interim status designation for its 122nd Street facility. The basis for Land and Lakes request is your assertion that the 122nd Street facility has never accepted hazardous waste nor does it intend to accept hazardous waste during its future operation as a waste disposal site.

Information available to EPA indicates that the 122nd Street facility may have disposed of hazardous waste erroneously identified as "non-hazardous". Therefore, in order to determine whether the 122nd Street facility accepted hazardous waste and whether termination of interim status is appropriate, you are requested to provide the following information:

1. A copy of 122nd Street facility's waste analysis plan required by 40 CFR 265.13.

2. A copy of each application to the Illinois Environmental Protection Agency (IEPA) for a special waste permit to dispose of such at the 122nd Street facility for the period November 19, 1980 to the present. Include a copy of each waste stream analysis which accompanied the application.

3. A copy of each permit issued by IEPA which authorizes the disposal of special waste at the 122nd Street facility for the period November 19, 1980, to the present.

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4. A copy of all documents which relate to your communications with IEPA concerning special waste handling practices at the 122nd Street facility including but not limited to correspondence concerning improper waste handling practices for the period November 19, 1980, to the present.

5. A copy of all documents which relate to transactions between Land and Lakes Company and special waste generators and transporters concerning the disposal of such wastes at the 122nd Street facility including correspondence between Environmental Dynamics, Inc. dba Liquid Dynamics and/or Inter Freight Transportation, Inc.

6. A copy of each special waste manifest which relates to the disposal of special waste at the 122nd Street facility for the period November 19, 1980, to the present.

7. A copy of each facility operating record(s), map(s), or diagram(s) or other document(s) which shows the location of the disposal of special wastes at the 122nd Street facility for the period of November 19, 1980, to the present.

To assist you in responding to this request for information the following definitions apply:

1. "Special waste" means any industrial process waste, pollution control waste, or hazardous waste.

2. "Hazardous waste" means a hazardous waste as defined at 40 CFR §261.3.

3. "Pollution control waste" means any liquid, solid, semi-solid or gaseous waste generated as a direct or indirect result of removal of contaminants from the air, water or land.

4. "Industrial process waste" means any liquid, solid, semi-solid or gaseous waste generated as a direct or indirect result of the manufacture of a product or the performance of a service.

5. "Document" means all written, typewritten, drawn or printed materials and all information recorded on magnetic or electronic media including but not limited to correspondence, letters, agreements, contracts, memoranda, inter-office communications, manifests, logs, invoices, and photographs.

6. "Disposal" means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including groundwaters.

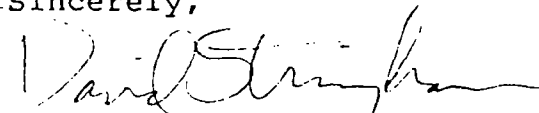
Statutory authority for this request for information can be found at section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. §6927(a). The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to 40 C.F.R. §2.203(b) for any information produced that if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in the 40 C.F.R. Part 2. A request for confidential treatment must be made when the information is provided since any information not so identified will not be accorded this protection by the Agency.

The written statement submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Should the signatory find at any time after submittal of the requested information that any portion of this submittal certified as true is false or misleading, the signatory should so notify EPA. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code.

The information requested herein must be provided within 15 working days following receipt of this request to the United States Environmental Protection Agency, Attn: Thomas Golz, Region V, Waste Management Branch, 230 South Dearborn Street, Chicago, Illinois 60604.

If you have any questions regarding this matter, please contact Mr. Golz, Waste Management Branch, at (312) 886-0990.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

cc: Pierre Talbert
Assistant Regional Counsel

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STATE OF ILLINOIS**